

RS-09-101-BRW
August 7, 2009

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Subject: Request to Use Specific Provisions from a Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI

Reference: NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and the guidance provided in the reference document, Exelon Generation Company, LLC (EGC) requests NRC approval to use specific provisions from a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, LaSalle County Station, Units 1 and 2, Limerick Generating Station, Units 1 and 2, and Peach Bottom Atomic Power Station, Units 2 and 3.

U.S. Nuclear Regulatory Commission
Request to Use Specific Provisions from a
Later Edition of the ASME B&PV Code, Section XI
August 7, 2009
Page 2

Specifically, EGC desires to utilize IWA-2221(c) ("Magnetic Particle Examination") and IWA-2222(b) ("Liquid Penetrant Examination") of the ASME Code, Section XI, 2004 Edition. IWA-2221(c) and IWA-2222(b) are not currently included in the 2001 Edition, through 2003 Addenda.

EGC requests approval of this request by August 7, 2010. There are no regulatory commitments in this letter.

If you have any questions concerning this letter, please contact Tom Loomis at (610) 765-5510.

Respectfully,

9/27


Pamela B. Cowan
Director - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Request to Use Specific Provisions from a Later Edition of the ASME B&PV Code, Section XI

cc: R. Janati – Commonwealth of Pennsylvania
Regional Administrator- NRC Region I
Regional Administrator - NRC Region III
NRC Senior Resident Inspector- Braidwood Station
NRC Senior Resident Inspector- Byron Station
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector- Limerick Generating Station
NRC Senior Resident Inspector- Peach Bottom Atomic Power Station

Attachment

**Request to Use Specific Provisions from a
Later Edition of the ASME B&PV Code, Section XI**

Proposed Use of Subsequent ASME Code Edition and Addenda
In Accordance with 10 CFR 50.55a(g)(4)(iv)
Page 1

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv) and the guidance provided in Reference 1, Exelon Generation Company, LLC (EGC) requests NRC approval to use specific provisions from a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, LaSalle County Station, Units 1 and 2, Limerick Generating Station, Units 1 and 2, and Peach Bottom Atomic Power Station, Units 2 and 3. Specifically, EGC desires to utilize IWA-2221(c) ("Magnetic Particle Examination") and IWA-2222(b) ("Liquid Penetrant Examination") of the ASME Code, Section XI, 2004 Edition. IWA-2221(c) and IWA-2222(b) are not currently included in the 2001 Edition, through 2003 Addenda.

The addition of IWA-2221(c) and IWA-2222(b) in the 2004 Edition will allow the nondestructive examiner to use a visual acuity card to verify illumination adequacy in lieu of a digital light meter, which is currently necessary to comply with the ASME Code, Section XI, 2001 Edition through 2003 Addenda. Use of the visual acuity card is an equivalent method to verify adequate lighting, and does not require a calibrated digital light meter. Use of the visual acuity card results in less radiation exposure to the examiner keeping within the principles of ALARA.

1. ASME Code Component(s) Affected:

All Class 1, 2, and 3, and MC components subject to examination under ASME Section XI using surface examination methods (e.g., magnetic particle examination and liquid penetrant examination).

2. Applicable Code Edition and Addenda:

The Inservice Inspection program is based on the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 2001 Edition through the 2003 Addenda for the following stations:

Station	Unit	Current Interval	Interval Scheduled End Date
Braidwood Station	1	3 rd	July 28, 2018
	2	3 rd	October 16, 2018
Byron Station	1	3 rd	July 15, 2016
	2	3 rd	July 15, 2016
LaSalle County Station	1	3 rd	September 30, 2017
	2	3 rd	September 30, 2017
Limerick Generating Station	1	3 rd	January 31, 2017
	2	3 rd	January 31, 2017
Peach Bottom Atomic Power Station	2	4 th	November 4, 2018
	3	4 th	November 4, 2018

3. Proposed Subsequent Code Edition and Addenda (or Portion):

EGC proposes to utilize specific provisions from the ASME Section XI, 2004 Edition in lieu of the current applicable station code editions and addenda. The following subparagraphs from the 2004 Edition will be applied for the magnetic particle and liquid penetrant examination of Class 1, 2, and 3, and MC components:

IWA-2221(c) - For nonfluorescent particles the visible light intensity required is 50 fc. Alternatively, light shall be sufficient if the examination can resolve standard test chart characters as described for VT-1 in IWA-2210.

IWA-2222(b) - For visible dye penetrant, the visible light intensity required is 50 fc. Alternatively, lighting shall be sufficient if the examiner can resolve standard test chart characters as described for VT-1 in IWA-2210.

These subparagraphs of the ASME Code are not included in the current edition of the ASME Code, Section XI, 2001 Edition through 2003 Addenda.

4. Related Requirements:

10 CFR 50.55a(g)(4)(iv) states:

"Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the limitations and modifications listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met."

10 CFR 50.55a(b)(2) incorporated by reference Section XI, Division 1, of the ASME B&PV Code, 2004 Edition, as approved in Reference 2. There are no limitations or modifications in 10 CFR 50.55a(b)(2) related to IWA-2221(c) ("Magnetic Particle Examination") and IWA-2222(b) ("Liquid Penetrant Examination").

5. Duration of Proposed Request:

The duration of this request will continue for the remainder of each site's ISI interval listed in Section 2 of this request.

6. References:

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004
2. Federal Register, 73 FR 52730, dated September 10, 2008